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Petition to Establish Tolerances for Chemical Flupyradifurone - First Food Use

Comment On: EPA-HQ-OPP-2013-0226-0007
Public Participation Memorandum for New Active Ingredient Flupyradifurone

Document: EPA-HQ-OPP-2013-0226-0024
Comment submitted by Jerry Baron, Executive Director, IR-4 Project, et al

Submitter Information

Organization: IR-4 Project

General Comment

The IR-4 Project supports EPA registration of Flupyradifurone (BYI02960), a new insecticide classified by EPA as Reduced Risk for several proposed uses. IR-4 has received ten specific requests for registration assistance from growers, commodity groups, state/federal researchers and extension personnel for this new insecticide on specialty food crops. IR-4 has also received requests for registration assistance on ornamental crops.

The IR-4 Project was established in 1963 by the State Agricultural Experiment Stations to provide a mechanism to develop data required by regulatory authorities to support pesticide registration on high value, low acreage crops (i.e. specialty crops). The IR-4 Project has developed a formalized scheme to prioritize potential solutions to pest management voids in specialty crops. This is a very selective and competitive process and decisions drive the use of limited research funds. During this process, IR-4 Food Use Workshop participants consider many factors in selecting projects including the availability and efficacy of alternative pest management products, the potential pest damage from the target pest, the performance of the proposed product in

managing the target pest and the compatibility of the proposed product in new and existing Integrated Pest Management Programs.

The need for Flupyradifurone on specialty crops was clearly articulated by stakeholders at past IR-4 Food Use Workshops. This product was chosen because it manages several critical pests such as aphids, leafhoppers, psyllids, whiteflies, scales, and thrips with limited risk/damage to honey bees. Flupyradifurone is expected to become an important tool for controlling such pests, especially when specialty crops are in bloom and attractive to honey bees, where use of other products may be restricted.

Because of the positive attributes of this product, Canada, Australia, Chile, Denmark, Italy, New Zealand, the United Kingdom, and Spain all cooperated with IR-4 in the development of residue data on blueberry. IR-4 conducted and managed this global Magnitude of the Residue study which was submitted to EPA and other world regulatory bodies by Bayer CropScience for a world-wide blueberry registration. Bayer CropScience also requested domestic registrations on clover and prickly pear cactus based on IR-4 residue data.

IR-4 has several other Flupyradifurone projects in the queue supporting caneberry, greenhouse cucumber, pomegranate, and greenhouse tomato and we expect to submit these data to EPA in 2015.

IR-4 appreciates the opportunity to work with modern state of the art products like Flupyradifurone that provide significant honey bee safety so that critical pests can be controlled during bloom and play a role in integrated pest management programs. This one factor makes the product incredibly important for specialty crops, many of which are reliant on pollination by honey bees.

Please let me know if you need additional information or if we can answer any additional questions.

Sincerely yours,

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